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**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA**

VALERIE GEORGE, as Administrator and Personal Representative of THE ESTATE OF RYAN GEORGE; VALERIE GEORGE and/or TAJMAH BEAUCHAMP, as Legal Representative(s) for Jaida George and Ryan George, Jr.; VALERIE GEORGE, Individually; DONALD GEORGE; and TAJMAH BEAUCHAMP, Individually,

Plaintiffs,

vs.

SONOMA COUNTY SHERIFF'S DEPARTMENT; BILL COGBILL; COUNTY OF SONOMA; CALIFORNIA FORENSIC MEDICAL GROUP, INC; JAMES LUDERS, M.D.; MICHAEL E. DAGEY, R.N.; SUTTER HEALTH; SUTTER MEDICAL CENTER OF SANTA ROSA; EDWARD W. HARD, M.D.; RICHARD FLINDERS, M.D.; JOSEPH N. MATEL, M.D.; NORICK JANIAN, M.D.; ANGUS MATHESON, M.D., and DOES 1 through 25, inclusive,

Defendants.

Case No. 3:08-cv-02675-EDL

ECF Case

**STIPULATION AND [PROPOSED] ORDER RE PLAINTIFFS' TIME TO RESPOND TO DEFENDANTS RICHARD FLINDERS, M.D.'S, AND JOSEPH N. MATEL, M.D.'S MOTION TO DISMISS AND NORICK JANIAN, M.D.'S MOTION TO JOIN**

**JURY TRIAL DEMANDED**

IT IS HEREBY STIPULATED AND AGREED by and between the undersigned counsel for all parties, that subject to the Court's approval, the date for Plaintiffs to respond to Defendants Richard Flinders, M.D.'s and Joseph N. Matel, M.D.'s motion to dismiss and Defendant Norick Janian, M.D.'s motion to join therein shall be as follows:

- (i) Plaintiffs' response to the above-described Defendants' motion to dismiss and motion to join shall be due April 7, 2009.
- (ii) Defendants' respective replies in support of their motions shall be due April 14, 2009.
- (iii) The return date of these motions shall be extended to April 28, 2008.

**SO STIPULATED.**

DATED: March 23, 2009

ROGASKI PREOVOLOS WEBER &  
PATTERSON

By: \_\_\_\_\_ /s/  
Chester Rogaski

241 Georgia Street  
Vallejo, CA 94590  
*Attorneys for Defendant Norick Janian, M.D.*

DATED: March 23, 2009

HASSARD BONNINGTON LLP

By: \_\_\_\_\_ /s/  
Joanna Storey

Two Embarcadero Center, Suite 1800  
San Francisco, CA 94111  
*Attorneys for Defendants Richard Flinders,  
M.D. and Joseph N. Matel, M.D.*

DATED: March 23, 2009

SANFORD WITTELS & HEISLER, LLP

By: /s/ Thomas Marc Litton  
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*Attorneys for Plaintiffs*

March 25, 2009

SO ORDERED:

